

# COVINGTON

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By ECF

January 6, 2025

Hon. Marcia M. Henry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Guan, et al. v. Mayorkas, et al.*, No. 1:19-cv-06570 (PKC/MMH)**

Dear Judge Henry:

We represent Plaintiffs Bing Guan, Go Nakamura, Mark Abramson, Kitra Cahana, and Ariana Drehsler in this matter. Defendants are Alejandro Mayorkas, Secretary of the U.S. Department of Homeland Security (“DHS”); Pete Flores, Acting Commissioner of U.S. Customs and Border Protection (“CBP”); and Patrick Lechleitner, Acting Director of U.S. Immigration and Customs Enforcement (“ICE”).<sup>1</sup> Pursuant to the Court’s order dated December 20, 2024, we write jointly on behalf of the parties to provide a status report on the parties’ settlement discussions.

The parties are pleased to report that they have reached a settlement-in-principle, subject to internal Department of Justice approvals. This settlement-in-principle must be finalized through a formal written agreement. The parties are working expeditiously to complete their final written agreement, and respectfully request that the Court direct the parties to provide another status report on or before January 27, 2025.

Further to the Court’s orders dated November 15, 2024, and December 20, 2024, the parties remain available to appear for a status conference should the Court wish to hear from the parties further.

We appreciate the Court’s attention to this matter.

Sincerely,



Andrew W. Hahn

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<sup>1</sup> Pursuant to Fed. R. Civ. P. 25(d), Pete Flores automatically is substituted as a Defendant for Troy Miller, and Patrick Lechleitner automatically is substituted as a Defendant for Tae Johnson.